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**VIA OVERNIGHT MAIL**

August 28, 2008

Thomas Nash,
Associate Regional Counsel
U.S. Environmental Protection Agency
Region 5, C-14J
77 West Jackson Blvd.
Chicago, IL 60604

SPX

Daniel McGrade
Director, Environmental
13515 Ballantyne Corporate Place
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Tel: (704) 752-4430
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Re: Chemical Recovery Systems (CRS) Site - Chemetron Process Equipment

Dear Mr. Nash:

This letter is in response to letter sent by Thomas R. Short, Jr. Chief Remedial Response Branch #2, US Environmental Protection Agency Region 5 Chicago IL, dated August 21, 2008, to "Chemetron Process Equipment c/o SPX Valves & Control (Attn: John Burtis)". Please see the attached letter, dated June 23, 2004, from Mr. Burtis to Ms. Martha A. Adams, Remedial Enforcement Support Section of the USEPA. The attached letter was in response to Ms. Adams' identification of SPX Corporation as a PRP at the CRS Site.

As you will see from the attached, in December 1982 a predecessor entity to SPX Corporation purchased from Allegheny International, Inc. certain assets of Chemetron Process Equipment. The sale occurred approximately one year after the CRS facility ceased accepting waste. Under the Purchase Agreement, the purchaser of the assets did not assume liability for prior waste disposal and the seller retained all liability not otherwise assumed. On information and belief, Allegheny International, Inc. continued as a viable corporate entity after the sale, although it appears to have filed for bankruptcy circa 1988.

For the foregoing reasons, SPX, as successor to the asset purchaser, has no liability for wastes allegedly sent by Chemetron Process Equipment to the CRS Site. Accordingly, SPX Corporation declines to participate in the CRS Superfund Site negotiations. Also, SPX requests that EPA remove SPX and its predecessor entities as Potential Responsible Parties (PRP) for the CRS Site.

Sincerely,

Cc: Chris Benson
Al Floro
Mary Tierney (US EPA, Region 5 Chicago IL)

SPX Corporation

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June 23, 2004

Ms. Marsha A. Adams
Remedial Enforcement Support Section
United States Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**RE: Chemical Recovery Systems Site, Elyria, Ohio
General Notice of Potential Liability and Request for Information
Chemetron Process Equip.**

Dear Ms. Adams:

This acknowledges receipt of your June 3, 2004 letter regarding the above-referenced matter. That letter was directed to Chemetron Process Equip. c/o SPX Valves and Controls. Based on the following history of Chemetron as relates to SPX Corporation, SPX has no legal connection with the Chemical Recovery Systems site because no predecessor of SPX ever owned or operated the site and no predecessor of SPX ever generated, transported, treated or disposed of hazardous substances to or at the site.

On December 9, 1982, one year after operations at the Chemical Recovery Systems site ceased, AMCA International Corporation purchased certain assets of Chemetron Process Equipment, Inc. from Allegheny International, Inc. These assets included two specific product lines, one located in Jeffersontown, Kentucky and one located in Oakland, California. This was an asset acquisition.

In April 1990, AMCA International Corporation changed its name to United Dominion Industries, Inc. In May 2001, United Dominion Industries Inc. was acquired by SPX Corporation in a stock acquisition.

Thus, at no time from the 1940's, when the Chemical Recovery Systems site was opened, through 1981, when the Chemical Recovery Systems site was closed, did SPX Corporation or any of its predecessors own or have any ownership interest in Chemetron Process Equipment. It was only after closure of the Chemical Recovery Systems site that certain assets of Chemetron Process Equipment were acquired by a predecessor of SPX Corporation.

Based on the foregoing, SPX Corporation has no legal responsibility regarding this site and will not be responding to the Request for Information you have provided.

Sincerely yours,

John M. Burtis
Director, Claims & Litigation

JMB/ks